

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL SMITH,)
)
Plaintiffs,)
)No.
vs.)5:17-cv-1302D
)
CSAA FIRE & CASUALTY INSURANCE)
COMPANY,)
)
Defendant.)

VIDEOTAPED DEPOSITION OF TIM FRANCE
TAKEN ON BEHALF OF THE PLAINTIFFS
IN OKLAHOMA CITY, OKLAHOMA
ON JANUARY 7, 2019

REPORTED BY: KAREN B. JOHNSON, CSR

1 believe it's not necessary to go into the crawl
2 space?

3 A Yes.

4 Q Why?

5 A There was nothing there that I saw that
6 would justify going into it, and, too, if I remember
7 correctly, there was no direct access to the crawl
8 space.

9 Q Did you ever consider destructive
10 investigation to get into there?

11 A No.

12 Q But that's something you could have done
13 to access if there was no access point; right?

14 A We could propose it, have to get approval
15 from the property owner then and the client to pay
16 for the repairs.

17 Q And that's something you guys could have
18 done; right?

19 A Could have.

20 Q I want to talk about the size of
21 earthquakes, all right?

22 A Okay.

23 Q How do you measure the size of an
24 earthquake?

25 A There's -- when you say "measure," by